



Department of Energy

Ohio Field Office
Fernald Area Office
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155

2236



MAY 14 1999

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0739-99

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

PERMIT INFORMATION SUMMARY FOR THE ADVANCED WASTEWATER TREATMENT LABORATORY EXPANSION PROJECT

This notification is being provided to inform your office that the Department of Energy (DOE) is planning on expanding the existing Advanced Wastewater Treatment (AWWT) laboratory. The purpose of the expansion is to handle the future analytical requirements for the AWWT laboratory, which includes the National Pollutant Discharge Elimination System (NPDES) analytical work and the site's liquid and metals analytical work. The expansion will include the following: Heating, Ventilation, and Air Conditioning (HVAC) modifications; electrical; lighting; lab benches; fume hoods; safety showers; and building addition. The new addition will extend west from Building 51 in the area of the existing laboratory and office. The approximate area of the addition is 400 square feet. The laboratory hoods in the existing lab and in the new addition will be exhausted to a common stack. The stack will be 94.3 feet in height and 22 inches in diameter. The stack flow rate will be 8220 acfm.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121(e)(1) states that no federal, state, or local permit will be required for the portion of any removal or remedial action conducted entirely on-site, where such remedial action is selected and carried out in compliance with Section 121. Modifications to the AWWT laboratory are being completed in support of the remedial action to clean up the Fernald Environmental Management Project (FEMP) and are being carried out in compliance with Section 121. Therefore, this project is not required to obtain any federal, state, or local permits. The project must, however, be conducted in accordance with the terms and conditions of those permits that otherwise would have been required.

MAY 14 1999

2236

Mr. James A. Saric
Mr. Tom Schneider

-2-

Section XIII.B of the Amended Consent Agreement requires DOE to identify those permits that otherwise would be required along with the standards, requirements, criteria, or limitations that would have had to be met to obtain each permit. DOE must report these findings to the U.S. Environmental Protection Agency (U.S. EPA) along with an explanation of how the response action will meet these standards, requirements, criteria, or limitations. The enclosure provides the Permit Information Summary that identifies permits and associated requirements that are applicable to the AWWT laboratory expansion project.

Please contact John Kappa at (513) 648-3149 if you have any questions or require additional information.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Kappa

Enclosure

MAY 14 1999

2236

Mr. James A. Saric
Mr. Tom Schneider

-3-

cc w/enclosure:

G. Jablonowski, USEPA-V, SRF-5J
R. Beaumier, TPSS/DERR, OEPA-Columbus
T. Schneider, OEPA-Dayton (three copies of enclosure)
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Barker, Tetra Tech
AR Coordinator, FDF/78

cc w/o enclosure:

N. Hallein, EM-42/CLOV
A. Tanner, OH/FEMP
D. Butterfield, FDF/52-5
D. Carr, FDF/52-2
T. Hagen, FDF/65-2
J. Harmon, FDF/90
R. Heck, FDF/2
S. Hinnefeld, FDF/31
J. Hughes, FDF/52-5
F. Johnston, FDF/52-2
P. Shanks, FDF/65-2
P. Spotts, FDF/65-2
T. Walsh, FDF/65-2
ECDC, FDF/52-7

3

MAY 14 1999

Mr. James A. Saric
Mr. Tom Schneider

-4-

2236

bcc w/enclosure:

R. J. Janke, OH/FEMP

PERMIT INFORMATION SUMMARY

2236

PROJECT: AWWT LABORATORY EXPANSION

AIR PERMITS

The operation of the AWWT laboratory (existing and new addition) will result in the generation of particulate and gaseous emissions from various exhaust hoods. The amount of particulate and gaseous emissions that will be released from the exhaust stack have been estimated to be minimal, therefore, the installation of off- gas control equipment will not be required.

A- Identification of Air Permits that Would Otherwise be Required

State Permits

PERMIT TO INSTALL - OAC 3745-31-02 (A): Unless exempted by OAC 3745-31-03, no person shall cause, permit or allow the installation of a new source of air pollutants or cause, permit or allow the modification of an air contaminant source without first obtaining a Permit To Install. Under ordinary circumstances, an air Permit To Install would have to be obtained for the AWWT laboratory.

PERMITS TO OPERATE - OAC 3745-35-02 (A): Except as otherwise provided in Paragraph H (Conditional Permits To Operate) of rule OAC 3745-35-02 and in OAC rules 3745-35-03 (variances) and 3745-35-05 (Permit exemptions and registration status), no person may cause, permit or allow the operation or other use of any air contaminant source without first applying for and obtaining a Permit To Operate. Under ordinary circumstances, Permits To Operate would have to be obtained for the AWWT laboratory.

Federal Permits

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) - 40 CFR PART 61, SECTION 61.07(a): The owner or operator shall submit to the Administrator an application for approval of the construction of any new source or modification of any existing source. Unless exempted in a specific subpart, an application for approval would have to be submitted for sources subject to a NESHAP standard. The AWWT laboratory is subject to the requirements of Subparts H of 40 CFR 61.

40 CFR PART 61, SUBPART H - NATIONAL EMISSION STANDARDS FOR EMISSIONS OF RADIONUCLIDES OTHER THAN RADON FROM DOE FACILITIES - Section 61.96(b) states that an application for approval does not have to be filed for radionuclide sources if the effective dose equivalent caused by all emissions from the new construction or modification is less than 0.1 mrem per year. Emissions from the

5

PERMIT INFORMATION SUMMARY

2236

AWWT laboratory have been determined to be less than 0.1 mrem per year, therefore, an application for approval does not have to be filed.

B- Identification of the Standards, Requirements, Criteria, or Limitations

The following would have to be met to obtain the above Permits/Notification:

State Requirements

PERMITS TO INSTALL - OAC 3745-31-05 (A): The modifications to the AWWT laboratory must not prevent or interfere with the attainment or maintenance of applicable ambient air quality standards; and must not result in a violation of any applicable laws; and must employ the best available technology to control emissions.

PERMITS TO OPERATE - OAC 3745-35-02 (C) - The AWWT laboratory must be operated in compliance with applicable air pollution control law; must be constructed, located or installed in compliance with the Terms and Conditions of a Permit To Install; and must not violate National Emission Standards for Hazardous Air Pollutants adopted by the Administrator of the EPA.

Federal Requirements

NESHAP SUBPART H - 40 CFR PART 61, SECTION 61.92: Emissions of radionuclides (except radon²²² and radon²²⁰) to the ambient air from Department of Energy facilities shall not exceed those amounts that would cause any member of the public to receive in any year an effective dose equivalent of 10 mrem/yr.

C- Explanation of How the Response Action Will Meet the Standards, Requirements, Criteria, or Limitations Identified Above

The modifications to the AWWT laboratory will not interfere with the attainment or maintenance of any applicable air quality standards; nor will it result in a violation of any applicable laws. The AWWT laboratory hoods shall be exhausted to an outside stack. Emissions from the laboratory stack have been estimated to be minimal, therefore, the installation of control equipment was determined to be unnecessary. If the number of samples processed inside the exhaust hoods increases in the future, gaseous and particulate emissions will be re-evaluated to ensure that these emissions remain de minimis.

4

PERMIT INFORMATION SUMMARY

2236

WATER PERMITS

The new addition to the AWWT laboratory will generate wastewater that will be combined with the wastewater from the existing AWWT laboratory. This wastewater will be routed to the AWWT for treatment before being discharged offsite under the National Pollutant Discharge Elimination System (NPDES) permit.

A- Identification of Wastewater Permits that Would Otherwise be Required

State Permits

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM - OAC 3745-33-02 (A): No person may discharge any pollutant or cause, permit, or allow a discharge of any pollutant without applying for and obtaining an Ohio NPDES permit. The FEMP currently operates under an approved Ohio NPDES permit.

Federal Permits

(The State of Ohio has primacy in administering the NPDES program.)

B- Identification of the Standards, Requirements, Criteria, or Limitations

The following would have to be met to obtain the above Permits/Notification:

State Requirements

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM - OAC 3745-33-02 (A): All discharges authorized under the NPDES permit shall be consistent with the terms and conditions of the permit. Facility expansions, production increases, or modifications which result in new, different or increased discharges of pollutants must be reported.

Federal Requirements

None.

C- Explanation of How the Response Action Will Meet the Standards, Requirements, Criteria, or Limitations Identified Above

State Requirements

The modifications to the AWWT laboratory will not interfere with the attainment or maintenance of any water quality standards; nor will it result in a violation of any applicable laws. Wastewaters generated by the construction and operation of the

2236

PERMIT INFORMATION SUMMARY

AWWT laboratory addition will not significantly alter the character of the plant effluent streams. Effluent from the AWWT laboratory will be discharged to existing systems for the treatment necessary to meet current NPDES effluent limitations.

Federal Requirements

None.

8